



1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

7925 JONES BRANCH DRIVE  
MCLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

[www.wileyrein.com](http://www.wileyrein.com)

October 13, 2015

Jennifer D. Hindin  
202.719.4975  
[jhindin@wileyrein.com](mailto:jhindin@wileyrein.com)

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Notice of Oral *Ex Parte* Presentation; Comprehensive Review of Licensing  
and Operating Rules for Satellite Services, IB Docket No. 12-267

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. § 1.1206, this letter notifies the Commission that on October 8, 2015, Susan Crandall, Hazem Moakkit, Roya Shambayati, Candice DeVane, and Dick Evans of Intelsat, and Jennifer Hindin of Wiley Rein LLP and counsel for Intelsat, met with Jose Albuquerque, Kerry Murray, Clay DeCell, Diane Garfield, Stephen Duall, and Chip Fleming of the Commission's International Bureau to discuss the FCC's two-degree spacing policy under consideration in the above-referenced proceeding.

Intelsat reiterated that the two-degree spacing policy should be eliminated or, at a minimum, should not be applied to new bands. In addition, Intelsat discussed its position that the Commission should retain existing power levels if the two-degree spacing policy is preserved, and noted that increasing the power levels would not have a positive net effect. Intelsat handed out the attached slides to illustrate the potential harmful effect on previously coordinated, existing operations of applying the two-degree spacing rules, and noted that that harmful effect would be exacerbated if the rules were retained with higher power levels.

Please contact the undersigned with any questions.

Sincerely,

*/s/ Jennifer D. Hindin*

Jennifer D. Hindin  
*Counsel for Intelsat*

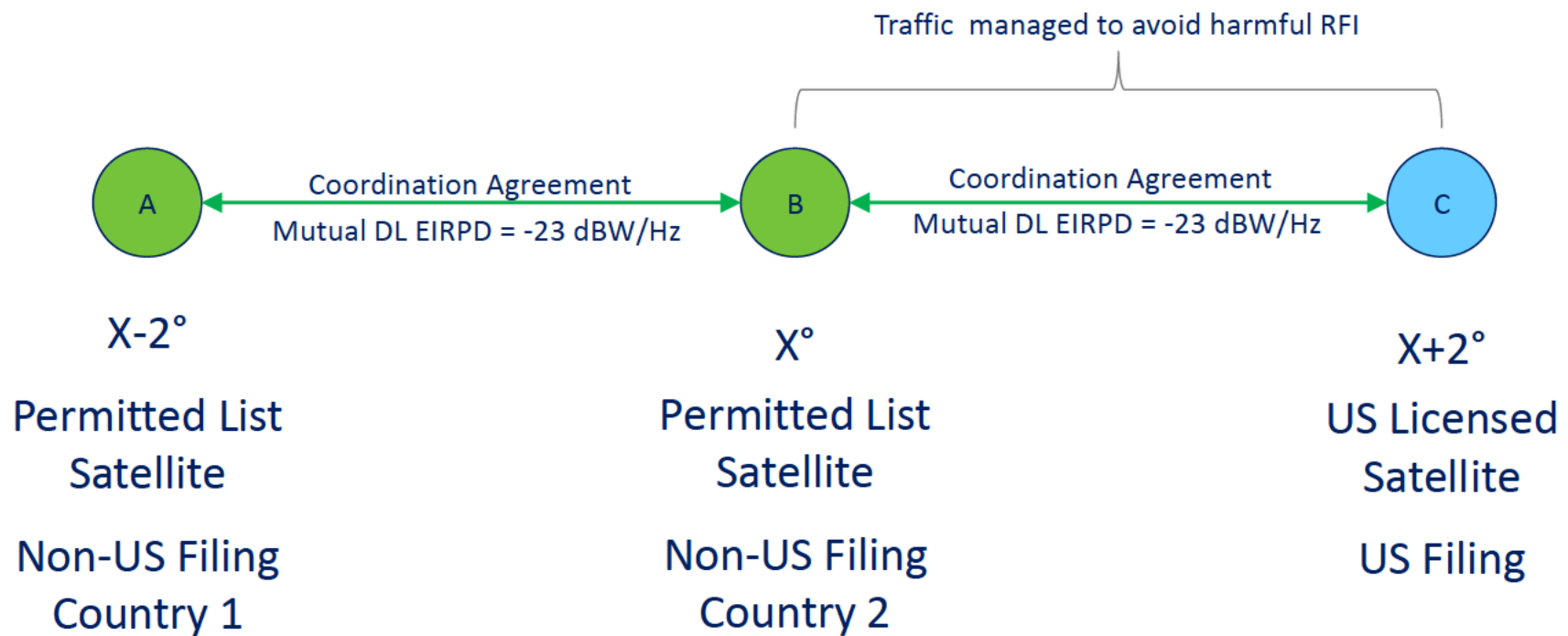


Ms. Marlene Dortch  
October 13, 2015  
Page 2

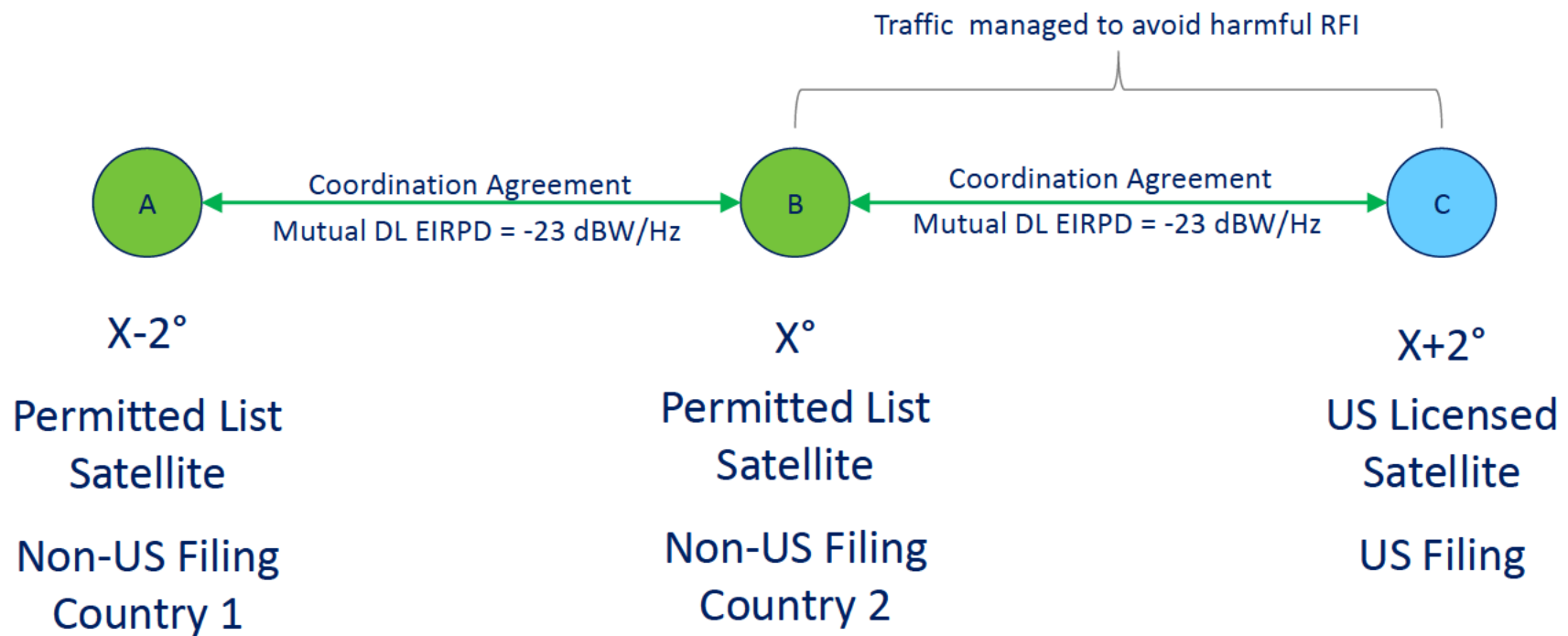
cc: Jose Albuquerque  
Kerry Murray  
Clay DeCell  
Diane Garfield  
Stephen Duall  
Chip Fleming

## 2° Rule Issue Example

## Issue: The Past



## Issue: The Past



## Issue: The Present

